



Federal Communications Commission  
Washington, D.C. 20554

December 28, 2012

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Measuring Broadband America Program, GN Docket No. 12-264

Dear Ms. Dortch:

On December 19, 2012, Nick Feamster, Associate Professor Georgia Tech, and David Levin, Research Scientist University of Maryland, met with Walter Johnston and James Miller, Federal Communications Commission to discuss the Commission's Measuring Broadband America program's mobile measurement effort. The meeting focused on discussion of privacy issues and program goals described in a review document presented at the November 28, 2012 mobile collaborative meeting and issues associated with cell tower location and GPS location info.<sup>1</sup>

Mr. Miller discussed ongoing work developing privacy policies to guide the collection and release of data. Mr. Johnston inquired what engineering techniques may exist to calculate locations for cell towers using a recorded GPS coordinate referenced from handsets and what privacy concerns might exist. Mr. Feamster stated access to a sample dataset would facilitate selecting useful engineering approaches. A dataset solely including GPS latitude and longitude values and Cell Tower IDs might provide useful results, but participants discussed availability of other radio elements such as signal strength would likely produce more accurate results.

Mr. Miller sought feedback on what re-identification techniques and third-party databases might use handset radio performance, such as received signal strength, to de-anonymize mobile performance data. Mr. Feamster indicated that predicting what level of anonymity the data would exhibit at a pre-collection stage was difficult, but expressed interest in assisting a post-collection engineering analysis and review of the collected data to identify correlations in the dataset and risks for known re-identification attacks.

Mr. Miller invited the participants to share further comments and feedback at the mobile collaborative meeting scheduled for December 21, 2012. Messrs. Feamster and Levin stated that the mobile performance data to be collected would have very high value for research purposes and would have interest in participating.

Sincerely,



James Miller, Senior Attorney Advisor  
Electromagnetic Compatibility Division/OET

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<sup>1</sup> The review document and an ex parte filing of the November 28, 2012 meeting are available in GN Docket No. 12-264.